REMARKS

I.   Summary of the Office Action

Claims 1-17 are pending in the application. The Examiner has rejected claims 1-17 under 35 U.S.C. §102(e), asserting that such claims are anticipated by U.S. Patent No. 6,697,827 to Bowman-Amuah ("Bowman").

II.   Summary of this Reply

In this Reply, claims 1, 12 and 17 are amended; no claims are canceled; no new claims are added.

Further, the specification is amended herein to address the Examiner's comments on pages 2 and 3 of the Action. More specifically, discussion of Figures 11-15 is added. No new matter is added. Further, amendments to the specification have been made to reflect that "Kevlar" is a trademark.

III.   Response to 102 Rejections

Claims 1-17 stand rejected over Bowman. A rejection under 35 U.S.C. §102 is proper only if each and every element of the claim is found in a single prior art reference. MPEP § 2131.

Claims 1-11

Independent claim 1 is directed to a computer-implemented method for presenting information in a viewer-specific manner. Bowman purports to disclose a system and method for interacting with a user over a network, for the purpose of personalizing a website. While Bowman may disclose some information respecting the actual personalizing of the website, Bowman clearly does not disclose the

particular method claimed. The claim is amended herein to emphasize some of the differences.

More specifically, the claimed invention involves <u>establishing a database of metadata. See application, pages 4-5, 6 and Figure 1.</u> This metadata provides relationships between various pieces of information that can be used in accordance with the present invention. Bowman neither teaches nor suggests establishing such a database of metadata.

Further, the metadata defines <u>a predetermined plurality of viewer states.</u> Thus the viewer states are predefined. See application, page 6. An applicable one of these predefined viewer states is subsequently identified for a particular viewer, and is used to develop a viewer-specific presentation of information, as recited in claim 1. In contrast, Bowman discloses gathering various non-specific data about a particular user over time and using such gathered information to develop a customized profile for each individual user. Bowman neither teaches nor suggests establishing such metadata.

Further, the metadata defines <u>at least one data state corresponding to each viewer state, a plurality of data types, and a plurality of data elements.</u> Each of the data elements is tagged (marked) for association with at least one of the data types and one of the data states. Accordingly, data is stored with predefined relationships to a viewer state. See Figures 1 and 5; application, page 8. Bowman neither teaches nor suggests establishing metadata creating such relationships.

Accordingly, as recited in claim 1, upon receiving a viewer's (e.g., Chef Hans Schmidt's) request for information, a viewer state associated with the viewer is identified (e.g., a German Food Prep viewer state is selected from among French Food Prep, German Medical, French Medical and/or other viewer states). The

database is then referenced to identify <u>one or more</u> data states related to the viewer

state (e.g., German Food Prep, German generic, English Food Prep, English

generic). Data types <u>relating to the request for information</u> are then identified by

reference to the database (e.g., for Chef Schmidt's request for gloves used in food

preparation, Title, Description, Photo, and Price data types may apply).

The <u>database is then referenced to</u> identify a data element data store storing

multiple data elements (text of a German language Food Prep Title, text of an

English language Food Prep Title, text of a German language Food Prep

Description, a default Photo, a Price in US dollars and a Price in German Marks,

etc.) each of which is <u>tagged for association</u> with one of the data states and one of

the data types (see 16, Figure 1).

The method then involves selecting viewer-specific data elements from the

data store by determining a corresponding data state of each data element in the

data store, examining data elements related to each data type, and for each data

type selecting a corresponding data element having a corresponding data state that

is preferred among said data states corresponding to said viewer state, presenting

the viewer-specific data elements to the viewer to satisfy the request for information.

For example, the German language Food Prep Title, German language Food Prep

Description, default Photo and Price in German Marks may be presented. If, for

example, no German language Food Prep Title is available, it may be preferred to

present the English language Food Prep Title rather than no title at all.

The methodology relies upon the predetermined relationships between

various stored data to present viewer-specific information in response to a particular

viewer's request for information. It is emphasized that the viewer is identified as

being associated with one of a plurality of predetermined/predefined viewer states,

and that products (entities), information relating to the products (data types), actual

data relating to the products and data types (data elements), etc. are all interrelated

in a predetermined way, and are stored in association with tags/markers identifying

the relationships (see Figure 1).

By way of specific example, each data element stored in the data store is

tagged with one of a plurality of data types and one of a predetermined plurality of

data states in preparation for subsequent data selection. This is neither taught nor

suggested by Bowman.

The viewer state is a collection of specific predetermined data states that

relate to tags of data elements in the data element data store. This is neither taught

nor suggested by Bowman.

For at least these reasons, Bowman fails to teach or suggest the claimed

invention. Reconsideration and withdrawal of the rejection are therefore requested

respectfully.

Claims 2-11 depend from claim 1 and are likewise patentable. In addition,

claim 2 further recites that the viewer state provides a list of data states in a ranked

order of preference. In this manner, if multiple data states are available, a more

highly ranked data state will be used, if possible, before a lower ranked data state.

This is neither taught nor suggested by Bowman.

Similarly, claim 3 recites that the corresponding data element comprises a

respective data element having a respective data state that is most highly ranked

among all data states corresponding to said viewer state. The viewer state is

therefore a collection of data states used to select the best available data element

from the data element data store for each given data type. In this manner, the best

available data element from the data element data store is selected for a specific

data type, using a specific data state, which is associated the viewer-specific viewer state. This is neither taught nor suggested by Bowman.

Claims 6-11 are patentable for similar reasons. Further, it is noted that claims 8, 9 and 11 involves use of design states/design templates for presenting the selected information in a customized manner, e.g. to change the visual formatting of various data elements based on the viewer state. Note that design states are associated with the viewer states. See application, page 11; Figure 6. This is neither taught nor suggested by Bowman.
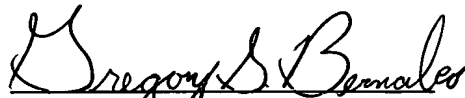
Claims 12-17

Independent claims 12-17 include recitations similar to those discussed above with reference to claims 1-11, and are likewise patentable.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants believe claims 1-17 to be patentable and the application in condition for allowance, and request respectfully issuance of a Notice of Allowance. If any issues remain, the undersigned requests a telephone interview prior to the issuance of an action.

Respectfully submitted,

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